Message

From: Scianni, Melissa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=96DF5A77C72A4D109141A14DCF9E5C9B-MSCIANNI]

Sent: 5/4/2022 10:10:53 PM

To: Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]; Gymer, Lisa@Wildlife [Lisa.Gymer@wildlife.ca.gov];

Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]; Steinert, Tiffany@Waterboards

[Tiffany.Steinert@waterboards.ca.gov]

CC: Tracey Brownfield [tracey@landveritas.com]; Nate Bello [bello@wra-ca.com]; Stephanie Gad [gad@wra-ca.com];

Julie Garren [julie.garren@wra-ca.com]

Subject: RE: FW: RIBITS Notification <u>↑</u> - Daily Activity

Thanks Marlene. We will take a look at this and get back to you.

Melissa Scianni Wetlands Office US EPA, Region IX, Southern CA Field Office 600 Wilshire Blvd, Suite 940 Los Angeles, CA 90017 (213) 244-1817 scianni.melissa@epa.gov

From: Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>

Sent: Wednesday, May 4, 2022 9:03 AM

To: Scianni, Melissa <Scianni.Melissa@epa.gov>; Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@waterboards.ca.gov>

Cc: Tracey Brownfield cc: Tracey Brownfield ca.com; Stephanie Gad ca.com;
Julie Garren julie.garren@wra-ca.com

Subject: Re: FW: RIBITS Notification ⚠ - Daily Activity

Hi all,

I believe we have identified what's going on with the negative balances on RIBITS following reporting of the Williams Homes sale. Please note that in our ledger we did not have any overdraft - all our balances are positive or 0. The main issue has to do with rounding and the level of precision that is tracked in RIBITS versus our ledger. I've detailed the specific explanations per credit type in the sections below, take a look and let me know if you have any further questions or if you'd like to hop on a Zoom so we can screen share and I can walk you through it more dynamically.

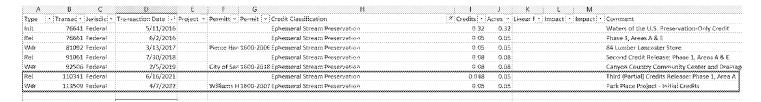
I recommend the release amounts input into RIBITS be adjusted to the 0.01-acre increment to resolve this issue, but please advise on next steps.

Thanks, Marlene

Ephemeral Stream Preservation:

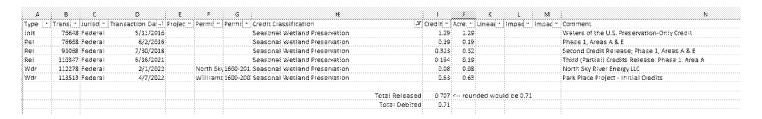
- We entered debits at the 0.01-increment but Release 3 was input at the 0.001-increment into RIBITS, changing the Total Released amount to show at the 0.001-increment
- Since we round up when reporting to RIBITS, it looks like we went over, but if Release 3 was input at the 0.01-increment we would not have gone over
- Release 3 was input as 0.048. Rounded up that would be 0.05, which is equal to our total debits

• The difference between 0.048 and 0.05 is 0.002, which is equal to the negative balance shown on RIBITS



Seasonal Wetland Preservation:

- We entered debits at the 0.01-increment but Release 2 and Release 3 were input at the 0.001-increment into RIBITS, changing the Total Released amount to show at the 0.001-increment.
- Since we round up when reporting to RIBITS, it looks like we went over, but if these two releases were input at the 0.01-increment we would not have gone over
- Release 1 was input as 0.19 but Release 2 was input as 0.323 and Release 3 as 0.194, making the total released 0.707. Rounded up that would be 0.71, which is equal to our total debits
- The difference between 0.707 and 0.71 is 0.003, which is equal to the negative balance shown on RIBITS



Open Water Preservation:

- Issue 1: Release 3 was never input into RIBITS, so a tiny fraction of 404 credit (0.001476 acres) is missing from the RIBITS ledger that we have recorded in ours total discrepancy is 0.002.
- Issue 2: Release 1 was input as 0.18 into RIBITS, but in our ledger it is actually 0.185, which we round up to 0.19 acres total discrepancy is 0.01.
- Result: The total of these two discrepancies is 0.012, which is how much it shows we are over debited on the RIBITS ledger.

Release 3	
404_Credit_Type	Sum of Transfer_Acres
Open Water Preserved	0.001476
Open Water Preserved	0.002459
Open Water Preserved	0.001476
Open Water Preserved	0.1839930
Open Water Preserved	0.3066550
Open Water Preserved	0.0000000
	0.49606
	xo- > 2 99,599,599,6
0.1854687	, Missing from RIBITS
0.3091145	5
0.0014757	7
I 0.4960589)
	7 404_Credit_Type 3 Open Water Preserved 0.1854687 0.3091145 0.0014757

A	8 C	0 E	F G		H			3 K	L	M	
Type	• Transac • Jurisdici •	Transaction Date 🧸 Project	· Permitt · Permit ·	Credit Classification		.¥ C	redits · A	res • Linea	r£ • Impact • I		Comment
init	76645 Federal	5/11/2016		Open Water Preservation	er roussded is 0.18		23	1.23	No Gradit		Waters of the U.S. Preservation-Only Credit
Rei	76665 Federal	6/2/2016		Open Water Preservation	ACPEC		0.18	0.18	Referencia included	proceedings.	Phase 1, Areas A & E
Rei	91065 Federal	7/30/2018		Open Water Preservation	***************************************		0.308	0.31	hypra hypra		Second Credit Release; Phase 1, Areas A & E
Wdr	113511 Federal	4/7/2022	Williams H 1600-2007	Open Water Preservation			0.5	0.5		i.	Park Place Project - Initial Credits

On Tue, May 3, 2022 at 4:57 PM Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com> wrote:

Hi all, just wanted to give an update that we are still looking into this but making progress and we will get back to you tomorrow with a resolution.

On Tue, May 3, 2022 at 12:43 PM Nate Bello < bello@wra-ca.com > wrote:

Hi all,

We will look into this further and get back to all of you. However, at first glance I notice the negative balances are in the thousandths of an acre, but per the BEI we only report debits to the hundredths of an acre. It appears the last release was entered to the thousandths, that could create the issue. I will look deeper.

Regards,

Nate

On Tue, May 3, 2022, 12:31 PM Tracey Brownfield tracey@landveritas.com wrote:

Hi Melissa,

WRA manages the ledger for the bank, and I asked them to look into this ASAP. We will keep you posted, Tracey

On Tue, May 3, 2022 at 11:09 AM Scianni, Melissa < Scianni. Melissa@epa.gov> wrote:

Hi Tracey,

RIBITS sent out notification today that the Petersen Ranch ledger has several negative balances. Can you please provide an explanation for the apparent negative balances noted below?

Thank you, Melissa

Melissa Scianni Wetlands Office US EPA, Region IX, Southern CA Field Office 600 Wilshire Blvd, Suite 940 Los Angeles, CA 90017 (213) 244-1817 scianni.melissa@epa.gov

----Original Message----

From: ribits helpdesk@araseas.com <ribits helpdesk@araseas.com>

Sent: Tuesday, May 3, 2022 12:25 AM

To: Scianni, Melissa < Scianni. Melissa@epa.gov>

Cc: ribits emailsent@araseas.com

Subject: RIBITS Notification 🛆 - Daily Activity

Dear MSCIANNI,

You are receiving this notification due to your affiliation with RIBITS banks, sites, ILF programs, umbrellas, NRDA programs/projects, or WQT programs/projects that have had recent activity.

For more detailed information, contact the appropriate manager or go to

 $\frac{\text{https://gcc02.safelinks.protection.outlook.com/?url=https:%3A%2F%2Fribits.ops.usace.army.mil%2F&data=05\%7C01%7CScianni.Melissa%40epa.gov%7C10b295d3624a42aec7a208da2cd61229%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637871595182029119%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQljoiV2luMzliLCJBTil6lk1haWwiLCJXVCl6Mn0%3D%7C3000%7C%7C%7C&sdata=MKDqpKde4AuJloimysQqoExlDNuuUuyujwTl7bZrCyg%3D&reserved=0.$

****Withdrawal causing negative Stream Ephemeral Stream Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)
Transaction Id: 113509
Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Stream

Credit Classification: Ephemeral Stream Preservation

Permittee: Williams Homes Permits: 1600-2007-0121-R5

Credits: .05

Resulting balance of available Stream Ephemeral Stream Preservation credits: -.002.

****Withdrawal causing negative Stream Open Water Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)
Transaction Id: 113511
Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Stream

Credit Classification: Open Water Preservation

Permittee: Williams Homes Permits: 1600-2007-0121-R5

Credits: .5

Resulting balance of available Stream Open Water Preservation credits: -.012.

****Withdrawal causing negative Wetland Seasonal Wetland Preservation balance for Petersen Ranch Mitigation Bank [Los Angeles District]****

Transaction (new)
Transaction Id: 113513
Date: 04/07/2022

Transaction Type: Withdrawal

Credit Type: Wetland

Credit Classification: Seasonal Wetland Preservation

Permittee: Williams Homes Permits: 1600-2007-0121-R5

Credits: .63

Resulting balance of available Wetland Seasonal Wetland Preservation credits: -.003.

Tracey Brownfield Land Veritas 1001 Bridgeway #246 Sausalito, CA 94965

(415)729-3734 (415)519-6530 cell (415)534-0950 fax <u>tracey@landveritas.com</u> www.landveritas.com

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